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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

OPEN NETWORK ARCHITECTURE TARIFFS
OF BELL OPERATING COMPANIES

CC Docket No. 92-91

To: Chief, Common Carrier Bureau

**COMMENTS IN SUPPORT OF MOTION FOR
SUSPENSION OF PROCEDURAL DATES**

The Ad Hoc Telecommunications Users Committee ("Ad Hoc Committee" or "Committee") hereby submits the following comments in support of the "Motion for Suspension of Procedural Dates" filed in the captioned docket by MCI Telecommunications Corporation ("MCI") on June 3, 1992. The Ad Hoc Committee fully agrees with MCI that if intervenors are to participate in a meaningful way in this investigation, the date for submission of comments on the Bell Operating Companies' ("BOCs") direct cases and other procedural dates should be suspended at least until such time as the BOCs have prepared and provided, and intervenors have had an opportunity to review, meaningful versions of the Switching Cost Information System ("SCIS") and Switching Cost Module ("SCM") computer models.

The Ad Hoc Committee has been an active participant in the Commission's review of the BOCs' Open Network Architecture ("ONA") tariffs. Among other things, the Committee commented on the BOCs' initial ONA tariffs, executed confidentiality agreements in order to obtain SCIS/SCM materials, analyzed the "redacted"

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materials provided by the BOCs pursuant to those confidentiality agreements, advised the Common Carrier Bureau ("Bureau") of its concerns regarding the usefulness of the SCIS/SCM materials provided by the BOCs, attended briefings by the Commission's independent auditor regarding its review of SCIS/SCM and proposed means to enhance the effectiveness of the SCIS/SCM audit.

Like MCI, the Ad Hoc Committee believes that its ability to analyze the BOCs' ONA tariffs has been severely hampered by the lack of meaningful data provided by the carriers. The "redactions" effected by the BOCs in the SCIS/SCM materials provided to the Committee pursuant to the Commission-mandated confidentiality agreements render those materials virtually useless. The information contained in the BOCs' direct cases is not only exceedingly sparse, but by repeated reference to undisclosed SCIS/SCM-related data, the BOCs' have made meaningful analysis that much more difficult.

The Ad Hoc Committee understands, and appreciates, the desire for expedition that drove the Commission to attempt to separate the issues in this proceeding into "public record" and "proprietary cost model" matters. That separation, however, has placed intervenors, given the current level of BOC disclosures, at a serious disadvantage in this proceeding. As MCI points out, for example, the BOCs in their direct cases offer easy references to or characterizations of SCIS/SCM, its functioning and the impact of various inputs thereto, but fail to produce the data necessary to enable intervenors to make a reasoned assessment of these claims because such information is deemed proprietary cost model data.

Like MCI, the Ad Hoc Committee would prefer not to submit generalized and largely unsupported commentary on the BOCs' direct cases. If the current procedural schedule is retained, the Committee may unfortunately have no other alternative. The data necessary to do otherwise remains available exclusively to the carriers. If, however, procedural schedules are suspended pending the availability of less heavily "redacted" versions of SCIS/SCM -- which the Committee understands the BOCs will soon produce at the direction of the Bureau -- the Committee and other intervenors may well be in a position to assist the Bureau in its review of the BOCs' ONA rates by submitting full and meaningful analyses of the proposed charges and their underlying cost structure.

The Ad Hoc Committee agrees with MCI that a temporary suspension of the current procedural schedule would not materially delay the conclusion of the Commission's investigation. Moreover, any incremental delay that might result from the requested suspension would be more than offset by the likelihood that a suspension would produce the full and complete record essential to reasoned resolution of the critical matters at issue in this proceeding.

Accordingly, the Ad Hoc Committee strongly urges the Bureau to grant MCI's "Motion for Suspension of Procedural Dates" and to defer the filing date for comments on the BOCs' direct cases at least until such time as the BOCs have prepared and provided,

and intervenors have had an opportunity to review, meaningful versions of SCIS/SCM.

Respectfully submitted,

**AD HOC TELECOMMUNICATIONS
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CERTIFICATE OF SERVICE

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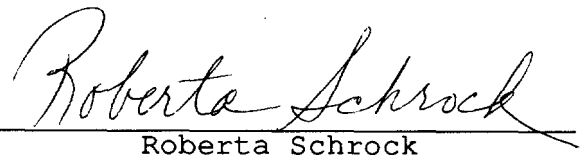
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A handwritten signature in cursive script, reading "Roberta Schrock", written in dark ink. The signature is fluid and elegant, with a long, sweeping underline that extends to the right.

Roberta Schrock